

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

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In re: James E. Miller, Jr.,

Debtor.

Case No. 13-23446  
Chapter 13

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SOUTHERN LAKES CREDIT UNION,

Creditor,

v.

JAMES E. MILLER, JR.,

Debtor.

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**OBJECTION TO CHAPTER 13 PLAN**

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Southern Lakes Credit Union hereby objects to the Chapter 13 Plan of the Debtor for the following reasons:

1. The debtor does not properly value the 2008 Ford Expedition. Landmark Credit Union contends that the value is \$22,150.00.
2. Interest rate on the secured debt should be 6.25%.
3. The plan provides for payment of administrative fees up front. The initial payments to the plan should be split between administrative fees and secured creditors.
4. The adequate protection payments should be \$663.26 per month.

Dated this 16th day of April, 2013.



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## Vehicle Evaluation

Period: 2013 April

Region: Central

VIN: 1FMFK20518LA00011 **Decode**

Reference #:

Year: 2008

Make: FORD TRUCK

Series: Expedition EL-V8

Body: Utility 4D Limited 4WD

Mileage: 130000 Adjustment: -\$3,275

MSRP: \$43,575 Weight: 0

- ☐ Auxiliary Fuel Tank
- ☐ Certified Pre-Owned
- ☐ Fixed Running Boards
- ☒ Leather Seats
- ☐ Luggage Rack
- ☐ Navigation System
- ☐ Power Running Boards
- ☐ Power Sunroof
- ☒ Power Third Row Seat
- ☐ Rear Bucket Seats
- ☐ Rear Entertainment System
- ☐ Snow Plow Pkg./Plow
- ☐ Towing/Camper Pkg
- ☐ W/o 3rd Row Seat
- ☐ W/out Aluminum/Alloy Wheels
- ☐ Winch

**Guide Values****Print Reports****AutoCheck**

	Rough Trade-In	Average Trade-In	Clean Trade-In	Clean Loan	Clean Retail
Base:	\$18,800	\$20,450	\$21,800	\$19,625	\$25,425
Mileage Adjustment:	-\$3,275	-\$3,275	-\$3,275	-\$3,275	-\$3,275
Options Adjustment:	\$0	\$0	\$0	\$0	\$0
Adjusted Value:	\$15,525	\$17,175	\$18,525	\$16,350	\$22,150

**Update My Auction Values**

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